

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO, TX. DIVISION

FILED

JUDGE FRANK MONTALVO

Joseph R. Rochefort

2020 NOV 30 PM 3:00

Plaintiff

CLERK US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

**EP 20 CV 0290**

BY  CASE NUMBER: \_\_\_\_\_

Global Precision Services  
Jennifer Gonzalez S-255  
Asset Protection Security Services  
Elizabeth Porras, Enforcement Supervisor

Defendants

## COMPLAINT

1. Joseph R. Rochefort, 14185 Spanish Point Dr. El Paso, TX 79938
2. Global Precision Services, 9733 Carnegie St. El Paso, TX 79925  
Jennifer Gonzalez, S-255 GPS employee, 9733 Carnegie St, EL Paso, TX 79925  
Asset Protection & Security Services, 5502 Burnham Dr. Corpus Christi, TX 78413  
Elizabeth Porras, Enforcement Supervisor for:  
EEOC El Paso Area Office, 100 N. Stanton St. 6<sup>th</sup> floor, Suite 600 El Paso, TX 79901
3. This case of Libel: (Title 4 liability in Tort, chapter 73) was committed in the jurisdiction of the Western District of Texas; plaintiff asks the El Paso, TX Division District Court to adjudicate this complaint.
4. Allegation 1. Plaintiff states the defendants conspired to disregard plaintiff supplied audio evidence of false sexual harassment and terminated Plaintiff base on same false charges of sexual harassment.
5. Allegation 2. Plaintiff was forced to resign in order to protect a government security clearance per Global Precision Services (GPS) inducement to resign allowing the

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whole matter to go away; not affecting my clearance. Plaintiff stated he would continue to fight his wrongful termination.

Plaintiff was forced to resign in order to protect a government security clearance per Asset Security Protection Services (ASP) inducement to resign allowing the whole matter to go away; not affecting my clearance. Plaintiff stated he would continue to fight his wrongful termination.

6. Allegation 3. Jennifer Gonzalez S-255, made a false charge of sexual harassment to facilitate plaintiff's termination. Plaintiff was relieved of duty on the 27<sup>th</sup> of Dec, 2019, terminated on the 31<sup>st</sup> of Dec, 2019.
7. Allegation 4. Elizabeth Porras during our intake interview for an EEOC complaint stated I was guilty of sexual harassment and wouldn't investigate the complaint.

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Mrs. Porras stated it is a case of he said, she said. I stated no, I have an audio recording, proving I didn't sexually harass Jennifer Gonzalez S-255. Mrs. Porras stated she doesn't investigate false charges of sexual harassment. Mrs. Porras with bias and personal malice supported the charge of sexual harassment against the plaintiff; thereby, complicit in support of libel and plaintiff's wrongful termination.

8. Allegation 5. Defendants, GPS and ASP provided false information to Homeland Security, Dept of ICE destroying plaintiff's government clearance; thereby, barring plaintiff from further government work requiring a clearance.

**Requested Relief for libel and wrongful termination**

Plaintiff is requesting re-employment with GPS as an Armed Transportation Officer at the Mattox, Montana ICE detention facility, as previously employed.

Plaintiff is requesting to be paid for all back pay as well as all over time pay that would have been worked by the plaintiff based on past work history; 40hrs regular, 15 to 20 hours overtime pay per week.

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Requested Relief for Libel and wrongful termination

Plaintiff is requesting to be paid for all lost overtime work for holidays at 2.5 times his pay rate. Holiday work is based on past work history.

Plaintiff is requesting damages for pain and suffering due to my wrongful termination.

Plaintiff is requesting damages for loss of reputation and emotional PTSD damage.

Plaintiff is requesting the sum of 2 million dollars; per defendant, for punitive damages, to motivate other entities not to engage in this wrongful behavior.

Plaintiff is requesting GPS and ASP provide Homeland Security with evidence Plaintiff isn't guilty of sexual harassment; nor, releasing any secure government information to the public.

Plaintiff further request reinstatement of my government clearance per order of this Court.

Plaintiff request payment for all expenses incurred for this Complaint; further, Plaintiff is not required to pay any opposing attorney fees or expenses for this complaint.

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**Requested Relief for Libel and wrongful termination**

Plaintiff is requesting any such further relief the court finds proper and allowed.

Plaintiff request any criminal actions uncovered in this complaint be referred to the El Paso County District Attorney or other government agency for prosecution.

Plaintiff request ability to amend this complaint for corrections and additions if needed.

Plaintiff request a court order demanding all electronic evidence, written memos and other related inter-company communications for adjudication of this matter be safe guarded, protected from damage or shredding of such evidence prior to discovery in this complaint; additionally, all email be saved and listed for discovery in this matter.

**Wherefore:** Plaintiff prays that the Court grant the forgoing relief to the plaintiff as described.

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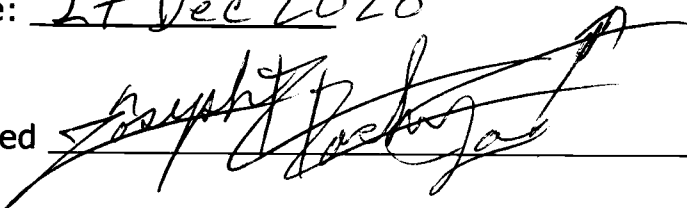
Certification of Complaint.

I declare (or certify, verify, or state) under penalty of perjury that the forgoing is true and correct.

Joseph R. Rochefort  
14185 Spanish Point Dr.  
El Paso, Tx 79938  
915-356-0024

Date: 27 Dec 2020

Signed

A handwritten signature in black ink, appearing to read "Joseph R. Rochefort", is written over a horizontal line.